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BY ECF

LONG ISLAND OFFICE

Hon. Joseph F. Bianco, District Judge
United States District Court for the
Eastern District of New York
Long Island Courthouse
100 Federal Plaza
Central Islip, NY 11722

Re: *United States v. Kenner*, Ind. No. 13-CR-607 (JFB).

Dear Judge Bianco:

As counsel to Philip A. Kenner, defendant herein, we write to request that our time to supplement his objections to the Presentence Report, which are currently due Friday, July 14th, be extended three weeks, to August 4th. We have spoken with A.U.S.A. Matthew Hagan, and the government takes no position concerning our request.

Despite substantial efforts, we have not been able to make sufficient progress to meet the deadline on Friday, primarily due to other work obligations and a long-scheduled one-week vacation, from which we just returned. This has been an unusually busy period. In particular, we filed four sentencing memoranda in June, and have another two due in the next two weeks, for sentencing hearings scheduled this month.

In addition, we note that codefendant Tommy Constantine filed a lengthy supplement to his Rule 33 motion, alleging ineffective assistance of counsel, on July 7th. No doubt, the government will require substantial time to respond, and Mr. Constantine's post-trial motions, as well as Mr. Kenner's Rule 33 motion, will then be under consideration by the Court. Thus, our request will not cause any delay in the case moving forward.

Request granted
Thank you for your attention to this request.

SO ORDERED

Joseph F. Bianco
USDJ

Date: July 13 2017
Central Islip, N.Y.

Respectfully submitted,

/s/
Jesse M. Siegel